

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE

JADEN BROWN,

Plaintiff,

vs.

CUMBERLAND COUNTY, et al.,

Defendants.

Civil No. 20-478-NT

**AFFIDAVIT OF SAM DICKEY**

I, Sam Dickey, hereby state under oath as follows:

1. My name is Sam Dickey. I am employed by Cumberland County as a Sheriff's Deputy working at the Cumberland County Sheriff's Office. At the time of the events alleged in the Plaintiff Jaden Brown's Complaint, I was so employed.

2. On February 10, 2019, my work assignment for the Jail was the 11:00 p.m. to 7:00 a.m. shift of the hospital detail at Maine Medical Center.

3. I was stationed on February 10, 2019 to provide security related to Ms. Brown, an inmate at the Jail who was at Maine Medical Center to deliver a baby.

4. During the course of my security shift related to Ms. Brown, I had no plan or intent to view Ms. Brown's naked body.

5. During the course of my security shift related to Ms. Brown, I did not place myself in a position to observe Ms. Brown's naked body.

6. At no time did I ever view Ms. Brown's naked body.

7. In particular, at no time did I ever view Ms. Brown's naked breasts or genitals.

Dated: 09/25/2022

/s/ Samuel Dickey III  
Sam Dickey

STATE OF MAINE  
Cumberland, ss.

Dated: 09/25/2022

Personally appeared the above-named Sam Dickey who made oath that the foregoing statements are true to the best of his personal knowledge.

Before me,

/s/ Eric Fowle  
Notary Public  
Commission Expires: 11/09/2026